

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT--LAW DIVISION

LANDMARK EDUCATION CORPORATION,

Plaintiff,

vs.

No. 94 L 11478

CULT AWARENESS NETWORK, an entity of
unknown legal character, CYNTHIA KISSER,
individually and as agent and Executive
Director of the CULT AWARENESS NETWORK,
JOHN and William Rehling, individually
and as agent and Director of the CULT
AWARENESS NETWORK, CULT AWARENESS NETWORK/
NORTH TEXAS, a business of unknown legal
character, CULT AWARENESS NETWORK/NY/NJ,
an entity of unknown legal character, and
JOHN & JANE DOES 1-50 and unknown aiders,
abettors & co-conspirators,

Jury Trial Demanded

Defendants.

SUPPLEMENTAL EXHIBIT TO
PLAINTIFF'S SECOND AMENDED COMPLAINT

NOW COMES the Plaintiff LANDMARK EDUCATION CORPORATION,
and through its attorneys and submits this Supplemental Exhibit
pursuant to this Court's orders of July 7, 1994, December 19, 1994,
1995 and September 4, 1996:

FILED
CLERK
DEC 20 1994
BY [signature]
JAN 10 1995

INTRODUCTION

This Supplemental Exhibit lists the statements by referring
to page numbers of the document, flyer, packet, or article wherein
they appear with respect to Counts I, III, and IV. Though these
statements are identified for reference purposes in isolation
pursuant to this Court's order, Plaintiff maintains, as is alleged
in its complaint, that said statements are injurious to Landmark

by reason of the context within which they are presented and the omission of other facts and favorable materials which were known or should have been known to Defendants. Furthermore, Plaintiff has isolated statements contained in these documents, flyer, packet, and articles which relate or refer to it and/or The Forum. Other defamatory, and disparaging statements relating to entities and persons other than Landmark appear in Defendants' materials. By omitting them from this list, Plaintiff does not agree with those statements or waive its right to rely them to prove its various causes of action alleged in the present suit.

COUNT I
(Defamation)

a. Flyer - Page 1 - "A serious problem exists in our society as a result of the emergence of groups, popularly called 'cults', using mind control (undue influence) and unethical means to recruit and retain followers. Association with these groups can be harmful to followers and disruptive to families, friends and society."

b. Flyer - Page 1 -

"TECHNIQUES OF MIND CONTROL"

"(Group pressure and "Love Bombing" discourages doubts and reinforces the need to belong through use of child-like games, singing, hugging, touching or flattery.

Isolation/Separation creates inability or lack of desire to verify information provided by the group with reality.

Thought-Stopping Techniques introduce recruit to meditating, chanting, and repetitious activities which, when used excessively, induce a state of high suggestibility.

Fear and Guilt induced by eliciting confessions to produce intimacy and to reveal fears and secrets, to create emotional vulnerability by overt and covert threats, as well as alteration of punishment and reward.

Sleep Deprivation encouraged under the guise of spiritual exercises, necessary training, or urgent projects.

Inadequate Nutrition sometimes disguised as special diet to improve health or advance spirituality, or as rituals requiring fasting.

Sensory Overload forces acceptance of complex new doctrine, goals, and definitions to replace old values by expecting recruit to assimilate masses of information quickly with little opportunity for critical examination.

Note: Not all of these features need to be present simultaneously for a mind control regime to be operative"

c. Flyer -Page 2- "The CULT AWARENESS NETWORK is a national, tax-exempt non-profit organization, dedicated to promoting public awareness of the harmful effects of mind control. CAN confines its concerns to unethical or illegal practices and does not judge doctrine or belief."

d. Flyer - Page 2 - "The Cult Awareness Network is a national non-profit organization founded to educate the public about the harmful effects of mind control as used by destructive cults. CAN confines its concerns to unethical or illegal practices, including coercive persuasion or mind control, and does not judge doctrine or beliefs ..."

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f. Flyer - Page 2 - "WHAT IS A DESTRUCTIVE CULT? A destructive cult is a closed system whose followers have been unethically and deceptively recruited through the use of manipulative techniques of thought reform or mind control. The system is imposed without the informed consent of the recruit and is designed to alter personality and behavior."

g. Flyer - Page 2 - "WHO ARE THEY? Those groups that have engaged in some illegal or unethical practices, including: child abuse, neglect and death; illegal immigration; drug dealing; fraud and deceit in their recruiting, business, financial, and fundraising activities; theft; harassment of critics, families and former followers with threats, lawsuits, and foul play; stockpiling or smuggling of weapons and ammunition; beatings;

sexual abuse and prostitution; kidnapping; murder; attempted murder; and psychological and emotional damage.

A partial list of groups about which CAN has received complaints, includes the following: ... The Forum/est/the Hunger Project..."

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"MARKS OF A DESTRUCTIVE CULT"

"[] Mind Control (undue influence):

Manipulation by use of coercive persuasion or behavior modification techniques without informed consent.

[] Charismatic Leadership: Claiming divinity or special knowledge and demanding unquestioning obedience with power and privilege. Leadership may consist of one individual or a small core of leaders.

[] Deception: Recruitment and fundraising with hidden objectives and without full disclosure of the use of mind controlling techniques; use of 'front groups.'

[] Exclusivity: Secretiveness or vagueness by followers regarding activities and beliefs.

[] Alienation: Separation from family, friends and society, a change in values and substitution of the cult as the new 'family'; evidence of subtle or abrupt personality changes.

[] Exploitation: Can be financial, physical, or psychological; pressure to give money, to spend a great deal on courses or give

excessively to special projects and to engage in inappropriate sexual activities, even child abuse.

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Loss of spontaneity or sense of humor.

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Physical deterioration and abuse.

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right place. You know what is in the best interest of every man, woman, and child better than they do themselves."

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"America's Most Wanted Cults"

"What makes a cult? The leading cult-awareness organizations cite the groups below - which range from sleek and sophisticated 'transformational workshops' to fundamentalist sects - as having been the subject of complaints for activities that include: trance-induction; manipulative recruitment; thought reform or mind control; harassment of critics and their families and former followers; psychological and emotional damage; and fraud and

deceit in fund-raising. The list was compiled from information provided by ... The Cult Awareness Network.

Personal growth/transformational/therapy; Corporate in style, these groups may own clusters of legitimate businesses, publish books and retain top public relations counsel:

[] The Forum (also est and The Hunger Project): Founded by Werner Erhard Personal growth, success, and sometimes the salvation of the world. Celebrity member: John Denver."

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COUNT III

(Interference with Prospective Economic Advantage)

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"America's Most Wanted Cults"

"What makes a cult? The leading cult-awareness organizations cite the groups below - which range from sleek and sophisticated 'transformational workshops' to fundamentalist sects - as having been the subject of complaints for activities that include: trance-induction; manipulative recruitment; thought reform or mind control; harassment of critics and their families and former followers; psychological and emotional damage; and fraud and deceit in fund-raising. The list was compiled from information provided by ... The Cult Awareness Network.

Personal growth/transformational/therapy; Corporate in style, these groups may own clusters of legitimate businesses, publish books and retain top public relations counsel:

[] The Forum (also est and The Hunger Project): Founded by Werner Erhard Personal growth, success, and sometimes the salvation of the world. Celebrity member: John Denver."

rr. "White Collar Cults - They Want Your Mind.." (Self Magazine - 2/93) - Page 7 - " 'It's highly unlikely' observes a wry Cynthia Kisser, 'that we would have had to have walked through all of history to get answers to life's problems from guys like Werner Erhard. Any group that promises transformation over the

weekend is not being truthful. There will be less than they promise.' "

COUNT IV
(False Light)

a. Flyer - Page 1 - "A serious problem exists in our society as a result of the emergence of groups, popularly called 'cults', using mind control (undue influence) and unethical means to recruit and retain followers. Association with these groups can be harmful to followers and disruptive to families, friends and society."

b. Flyer - Page 1 -

"TECHNIQUES OF MIND CONTROL"

"(Group pressure and "Love Bombing" discourages doubts and reinforces the need to belong through use of child-like games, singing, hugging, touching or flattery.

Isolation/Separation creates inability or lack of desire to verify information provided by the group with reality.

Thought-Stopping Techniques introduce recruit to meditating, chanting, and repetitious activities which, when used excessively, induce a state of high suggestibility.

Fear and Guilt induced by eliciting confessions to produce

intimacy and to reveal fears and secrets, to create emotional vulnerability by overt and covert threats, as well as alteration of punishment and reward.

Sleep Deprivation encouraged under the guise of spiritual exercises, necessary training, or urgent projects.

Inadequate Nutrition sometimes disguised as special diet to improve health or advance spirituality, or as rituals requiring fasting.

Sensory Overload forces acceptance of complex new doctrine, goals, and definitions to replace old values by expecting recruit to assimilate masses of information quickly with little opportunity for critical examination.

Note: Not all of these features need to be present simultaneously for a mind control regime to be operative"

c. Flyer -Page 2- "The CULT AWARENESS NETWORK is a national, tax-exempt non-profit organization, dedicated to promoting public awareness of the harmful effects of mind control. CAN confines its concerns to unethical or illegal practices and does not judge doctrine or belief."

d. Flyer - Page 2 - "The Cult Awareness Network is a national non-profit organization founded to educate the public about the harmful effects of mind control as used by destructive

cults. CAN confines its concerns to unethical or illegal practices, including coercive persuasion or mind control, and does not judge doctrine or beliefs...."

e. Flyer - Page 2 - "We are dedicated to bringing to public awareness the harmful effects of destructive cults..."

f. Flyer - Page 2 - "WHAT IS A DESTRUCTIVE CULT? A destructive cult is a closed system whose followers have been unethically and deceptively recruited through the use of manipulative techniques of thought reform or mind control. The system is imposed without the informed consent of the recruit and is designed to alter personality and behavior."

g. Flyer - Page 2 - "WHO ARE THEY? Those groups that have engaged in some illegal or unethical practices, including: child abuse, neglect and death; illegal immigration; drug dealing; fraud and deceit in their recruiting, business, financial, and fundraising activities; theft; harassment of critics, families and former followers with threats, lawsuits, and foul play; stockpiling or smuggling of weapons and ammunition; beatings; sexual abuse and prostitution; kidnapping; murder; attempted murder; and psychological and emotional damage.

A partial list of groups about which CAN has received complaints, includes the following: ... The Forum/est/the Hunger Project..."

h. Flyer - Page 4 :

"MARKS OF A DESTRUCTIVE CULT"

"[] Mind Control (undue influence):

Manipulation by use of coercive persuasion or behavior modification techniques without informed consent.

[] Charismatic Leadership: Claiming divinity or special knowledge and demanding unquestioning obedience with power and privilege. Leadership may consist of one individual or a small core of leaders.

[] Deception: Recruitment and fundraising with hidden objectives and without full disclosure of the use of mind controlling techniques; use of 'front groups.'

[] Exclusivity: Secretiveness or vagueness by followers regarding activities and beliefs.

[] Alienation: Separation from family, friends and society, a change in values and substitution of the cult as the new 'family'; evidence of subtle or abrupt personality changes.

[] Exploitation: Can be financial, physical, or psychological; pressure to give money, to spend a great deal on courses or give excessively to special projects and to engage in inappropriate sexual activities, even child abuse.

[] Totalitarian Worldview (we/they syndrome): Effecting

dependence, promoting goals of the group over the individual and approving unethical behavior while claiming goodness."

i. Flyer - Page 4 -

"HARMFUL EFFECTS:"

" (Loss of free will and control over one's life.
Development of dependency and return to child-like behavior.
Loss of spontaneity or sense of humor.
Inability to form intimate friendships outside the cult or enjoy flexible relationships.
Physical deterioration and abuse.
Psychological deterioration (including hallucinations, anxiety, paranoia, disorientation, and dissociation).
Involuntary, de facto servitude or exploitation."

j. "Checking Up On Est" (Cosmopolitan 6/86) - Page 2 "... While others [assistants] ... guarded the doors to make sure nobody left the room."

k. "Checking Up On Est" (Cosmopolitan 6/86) - Page 3 - "I felt annoyed that he was discussing out participation in further seminars as a fait accompli when we'd completed but half the original program. And it seemed particularly manipulative that he chose to do this at a time when many of us were feeling so emotionally vulnerable."

l. "Checking Up On Est" (Cosmopolitan 6/86) - Page 4 - "This

was chutzpah [sic] raised to the level of religion..."

m. "Checking Up On Est" (Cosmopolitan 6/86) - Page 5 - "I saw a couple of people trying to leave, but their paths were blocked by assistants. In one case, two assistants created a wedge, and the man had to hurl himself between them to get out."

m. "Est Revisited" (New Woman 1/87) - Page 3 - "The group's initial confusion and will to resist had largely been dissolved."

n. "Est Revisited" (New Woman 1/87) - Page 3 - "I refused to complete my application. This was not an act of courage. It was my automatic resistance to coercion."

o. "Est Revisited" (New Woman 1/87) - Page 4 - "... The only way to make his [Erhard's] theories have a real impact in people's lives is to force their acceptance via pressure from charismatic leaders (the trainers) and fear of public opprobrium (the other trainees) in a controlled environment (The Forum)."

o. "Est Revisited" (New Woman 1/87) - Page 4 - "While Forum ideas make for interesting intellectual debate, to bring about true change they must be embraced unthinkingly and unquestioningly, without critical analysis, as an act of faith. This, however, is easier said than done unless you condition people to stop thinking or you make them afraid to think."

How do you do this? You start by putting trainees in a state of physical and mental exhaustion. Then you tap into a deep, common fear - that of public speaking - based on a fear of being publicly humiliated. Next, you make that fear come true. You introduce a powerful authority figure ... his or her job is not

merely to explain Forum theory but also to isolate the unbelievers (by making them stand and use a microphone to address an audience) and cause them to look foolish."

p. "Est Revisited" (New Woman 1/87) - Page 4 - "After long, tedious hours of this exercise, the will to resist begins to erode. The accepters [sic] start to outnumber the resisters, not because they really understand and embrace the philosophy (if they did, further training would be unnecessary) but out of exhaustion, fear, eagerness to please the trainer, and a desire to get their money's worth from the experience (which is also an effective technique in psychotherapy). After a certain point, any person who announces skepticism is threatened with banishment. Then the larger group is turned against the smaller one, increasing pressure on the resisters to conform."

q. "Est Revisited" (New Woman 1/87) - Page 4 - "Can people really change anything major about themselves--let alone lifelong beliefs--in just two weekends and an evening? Unfortunately, this is not very likely. Extra training, then, becomes inevitable. But this must be kept secret at the start. If you were honest with prospective enrollees and told them what they were really getting into, it is probable that the number of actual participants would drastically drop. Manipulation and coercion are justified, because you sincerely believe your heart is in the right place. You know what is in the best interest of every man, woman, and child better than they do themselves."

r. "Est Revisited" (New Woman 1/87) - Page 4 - "No one

should commit to an emotional experience as intense as The Forum without being fully aware of what is involved, and a Forum representative should tell people the whole truth beforehand rather than pressure them to make further training commitments without prior knowledge."

s. "Agency spends \$4,800 on 'cultlike' seminars (Columbus Dispatch 2/10/92) - Page 1 - "... To attend 'cultlike seminars' created by 'est' founder Werner Erhard, who is accused by a daughter of incest and by the IRS of income tax evasion. ... The seminars, collectively called The Forum ..."

t. "Agency spends \$4,800 on 'cultlike' seminars (Columbus Dispatch 2/10/92) - Page 1 - "Columbus police and others believe The Forum has some characteristics of a cult."

u. "Agency spends \$4,800 on 'cultlike' seminars (Columbus Dispatch 2/10/92) - Page 1 - "Those who don't want to participate in some sessions are often bullied by the group leader, the employee said."

v. "Agency Spends \$4,800 On 'Cultlike' Seminars (Columbus Dispatch 2/10/92) - Page 2 - "Morse said The Forum is 'a sophisticated cult' that uses mind control, brainwashing, psychological manipulation and emotional control."

w. "Agency spends \$4,800 on 'cultlike' seminars (Columbus Dispatch 2/10/92) - Page 2 - "Morse believes the techniques include mass hypnosis".

x. "Agency spends \$4,800 on 'cultlike' seminars (Columbus Dispatch 2/10/92) - Page 2 - "Columbus Police Detective Jim

Lanfear ... said The Forum 'involves behavior modification and what appears to be stressful situations to get you to come around to a particular way of thinking ... it is no different than any other cult ... a human being has to be redefined. You will not come out of there the same.' "

y. "Agency spends \$4,800 on 'cultlike' seminars (Columbus Dispatch 2/10/92) - Page 2 - "Paul Martin ... describes The Forum as 'cultic' ... and he also believes that forms of mass hypnosis are used."

z. "Few agencies interested in est-like program" (Columbus Dispatch) 2/11/92) - Page 1 - "Franklin County Children's Services recently stopped promoting a program for delinquent and unruly children that was built on ideas of Werner Erhard, the creator of est and a program called The Forum that some people say is similar to a cult."

aa. "Few agencies interested in est-like program" (Columbus Dispatch) 2/11/92) - Page 1 - "Erhard is being sued by former employees of est and participants in The Forum who say they were damaged by him or the seminars."

bb. "Self-Help Course Allegedly Shattered a Life" (The Washington Post (7/7/92)).

cc. "Seminars leave firms divided" (London Times 7/23/92) - Page 1 - "Ian Howarth, who founded the Cult Information Centre . . . 'I would be concerned about any company using Est-based techniques or methods. Est can be described as a therapy cult.'"

dd. "Mercenary Mindboggling" (London Times 7/23/92) - Page 1

- "The training sessions were a potent brew of arcane philosophy, smooth salesmanship, amateur psychiatry, psychological brow-beating and New Age mysticism. Such techniques prey upon human suggestability [sic] and are designed to induce dependency, confusion and self-doubt."

ee. "Mind Game Courses Aimed at Public Sector Workers" (London Times 7/22/92) - Page 1 - "Mind Game Courses Aimed at Public Sector Workers".

ff. "The Return of Werner Erhard: Guru II" (LA Magazine 5/88) - Page #22 - "... critics who have condemned both the est training and the Forum on grounds that the methods are psychologically manipulative. In this country, the most consistent Erhard critic has been the Cult Awareness Network. ..."

gg. "The Return of Werner Erhard: Guru II" (LA Magazine 5/88) - Page #23 - "'We classify est, the Forum and the Hunger Project as destructive cults,' says the organization's Executive Director, Cynthia Kissér. Among the many dozens of other blacklisted cults are Scientology, Hare Krishna, Transcendental Meditation, The Unification Church and, at the top of the list for the last several months by a large margin, Satanism."

hh. "The Return of Werner Erhard: Guru II" (LA Magazine 5/88) - Page #23 - "The network's decision to put a cult on its list is based on complaints by parents, police, social workers and some cult members, as well as newspaper and magazine articles, and occasionally, well-publicized studies. The information on a cult suspected of being dangerous is virtually all secondhand and

rarely, if ever, checked."

ii. "The Return of Werner Erhard: Guru II" (LA Magazine 5/88)
- Page #23 - " 'I would say the single most damaging thing about est and the Forum' insists Kisser, 'is that they are able to market themselves to businesses and consumers as self-awareness programs when, in fact, they are slipping in mind-control techniques without the content or knowledge of the people who sign up.' "

jj. "The Return of Werner Erhard: Guru II" (LA Magazine 5/88)
- Page #23 - "'But we've gotten a lot of complaints,' says Henrietta Crampton, coordinator of the network in Los Angeles. 'Most were from husbands or wives who said their spouse's personality had completely changed. The biggest complaint was that after going to these seminars their spouse seemed more dedicated to Werner Erhard than to the marriage. There was a sense they'd been programmed.' "

kk. "Ten Years After Jonestown, The Battle Intensifies Over The Influence of 'Alternative' Religions" (LA Times 11/88) - Page 16 - "Cult critics point, for instance, to the rise of such groups as the est offshoot called Forum, and to Lifespring and Insight - all of which CAN characterizes as 'human potential cults' and all of which are utilized in mainstream American business to promote productivity and motivation."

ll. "White Collar Cults - They Want Your Mind.." (Self Magazine - 2/93) Page 2 - "... experts say, women are flocking to what are, according to Cynthia Kisser, executive director of the

Cult Awareness Network, 'upscale cults for the more affluent.'"

mm. "White Collar Cults - They Want Your Mind.." (Self Magazine - 2/93) Page 2 - "Slicker than the hard-core religious sects (such as the Unification Church and the Boston Church of Christ), the new cults keep a sophisticated, media-wise profile. Nevertheless, says Kisser, 'they mirror techniques used by less sophisticated religious cults. The tactics are the same.' And the results can be just as devastating."

nn. "White Collar Cults - They Want Your Mind.." (Self Magazine - 2/93) Page 3 - "The Forum (a toned down reincarnation of est)..."

oo. "White Collar Cults - They Want Your Mind.." (Self Magazine - 2/93) Page 6 -

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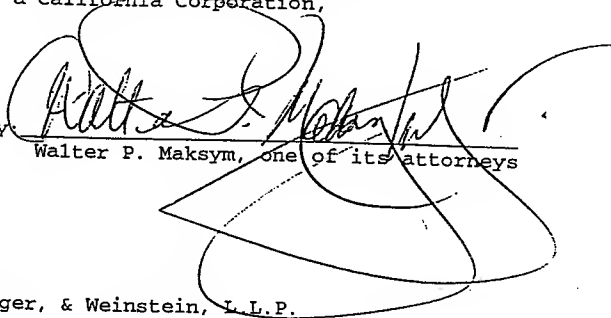
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Respectfully submitted,

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